

IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

ERIKA MORENO CASTANEDA
VICTOR SANCHEZ CANOLA
WILSON SERRANO PAREDES

:
: Criminal No.
:
: Violations:
:
: Date Filed:
:
: 21 U.S.C. § 846 (Conspiracy to possess with
: with intent to distribute heroin - 1 count)
:
: 21 U.S.C. § 846 (Attempt to possess with
: with intent to distribute heroin - 2 counts)
:

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From at least in or about October 2002 through in or about June 2003, in the Eastern District of Pennsylvania and elsewhere, defendants

ERIKA MORENO CASTANEDA
VICTOR SANCHEZ CANOLA and
WILSON SERRANO PAREDES

conspired and agreed, together and with others known and unknown to the grand jury, to knowingly and intentionally possess with intent to distribute more than one kilogram, that is approximately six kilograms, of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

MANNER AND MEANS

2. It was part of the conspiracy that defendant ERIKA MORENO

CASTANEDA sent multi-kilogram quantities of heroin from Colombia to the United States. Defendant ERIKA MORENO CASTANEDA arranged for the heroin to be purchased in the United States and gave instructions about how the money to buy the heroin should be sent to Colombia.

It was further a part of the conspiracy that:

3. Defendant WILSON SERRANO PAREDES received heroin shipped by defendant ERIKA MORENO CASTANEDA for distribution in the Philadelphia area.

4. Defendant VICTOR SANCHEZ CANOLA assisted defendant ERIKA MORENO CASTANEDA in receiving heroin for distribution while defendant CASTANEDA was in the United States.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its object, the following overt acts, among others, were committed in the Eastern District of Pennsylvania and elsewhere:

1. On or about December 17, 2002, agents seized approximately 170 grams of heroin that defendant ERIKA MORENO CASTANEDA and others known and unknown to the grand jury, shipped from Colombia to the United States through the mail to a confidential source ("CS"). The heroin was hidden in a package containing dolls.

2. On or about December 24, 2002, Fernando Bustos-Triana, a co-conspirator charged elsewhere, entered the United States after swallowing approximately 1,406 grams of heroin. Defendant ERIKA CASTENDA MORENO and others known and unknown to the grand jury, requested that the CS meet Bustos-Triana.

3. On or about February 3, 2003, agents seized approximately 212 grams of heroin defendant ERIKA MORENO CASTANEDA and others known and unknown to the grand

jury, shipped from Colombia to the United States through the mail to the CS. The heroin was hidden inside a child's laptop computer.

4. On or about February 20, 2003, agents seized approximately 500 grams of heroin defendant ERIKA MORENO CASTANEDA and others known and unknown to the grand jury, shipped from Colombia to the United States to the CS. The heroin was secreted into foam material that was inside a baby blanket and two pillows.

5. On or about March 4, 2003, defendant ERIKA MORENO CASTANEDA and others unknown to the grand jury, arranged with the CS the delivery of the heroin extracted from the baby blanket and pillows to an individual known as "El Buey." On or about March 7, 2003, defendant WILSON SERRANO PAREDES attempted to receive the alleged extracted heroin on behalf of another person known to the grand jury.

6. On or about March 17, 2003, agents seized approximately 234 grams of heroin that defendant ERIKA MORENO CASTANEDA and others known and unknown to the grand jury, shipped from Colombia to the United States through the mail to the CS. The heroin was hidden in the packaging that held 12 ceramic figures.

7. On or about April 24, 2003, agents seized approximately 267 grams of heroin defendant ERIKA MORENO CASTANEDA and others known and unknown to the grand jury, shipped from Colombia to the United States through the mail to the CS. The heroin was hidden in the packaging that held three ceramic figures.

8. On or about May 5, 2003, Luis Maria Gomez-Lopo and Veronoca Gurricharri, co-conspirators charged elsewhere, entered the United States with approximately three kilograms of heroin hidden in two suitcases. Defendant ERIKA MORENO CASTANEDA and others known and unknown to the grand jury, supplied the heroin that Gomez-Lopo and

Gurricharri possessed.

9. On or about May 21, 2003, agents seized approximately 500 grams of heroin that defendant ERIKA MORENO CASTANEDA and others known and unknown to the grand jury, shipped from Colombia to the United States to the CS. The heroin was secreted into foam material that was inside a baby blanket and two pillows.

10. On or about June 18, 2003, defendants ERIKA MORENO CASTANEDA and VICTOR SANCHEZ CANOLA met with the CS and received the alleged heroin that was delivered on May 21, 2003.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 7, 2003, at Philadelphia, in the Eastern District of
Pennsylvania, defendant

WILSON SERRANO PAREDES

knowingly and intentionally attempted to possess with intent to distribute more than 100 grams,
that is approximately 453 grams, of a mixture or substance containing a detectable amount of
heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 846.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 18, 2003, at Philadelphia, in the Eastern District of
Pennsylvania, defendants

ERIKA MORENO CASTANEDA
and
VICTOR SANCHEZ CANOLA

knowingly and intentionally attempted to possess with intent to distribute more than 100 grams,
that is approximately 500 grams, of a mixture or substance containing a detectable amount of
heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 846.

NOTICE OF FORFEITURE

1. As a result of the violations of Title 21, United States Code, Section 846 set forth in Counts One through Three of this Indictment, defendants

ERIKA MORENO CASTANEDA
VICTOR SANCHEZ CANOLA and
WILSON SERRANO PAREDES

shall forfeit to the United States:

(a) any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the violations of Title 21, United States Code, as charged in this indictment, including, but not limited to: \$2,593

(b) any property constituting, or derived from, proceeds obtained directly or indirectly as the result of the violations of Title 21, United States Code, as charged in this indictment, including, and

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 21, United States Code, Section 853.

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney